

Tab 3

COPY

1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3 VALERIE W. WAKEFIELD, : Civil Division
4 Plaintiff, :
5 : Civil Action
6 : No. 05 CV 79 - Erie
7 VS. :
8 JOY MINING MACHINERY :
9 COMPANY, a division of :
Harnischfeger Industries, :
Defendant. : Honorable Maurice B.
Cohill, Jr.

10
11 Deposition of : LARRY MEADE
12 Date : September 20, 2006
13 commenced at 9:00 a.m.
14 Place : Franklin Club
15 1341 Liberty Street
Franklin, PA

16
17 APPEARANCES:

18 FOR THE PLAINTIFF:
19 ALEXANDER H. LINDSAY, JR., ESQ.
The Lindsay Law Firm, P.C.
20 128 South Main Street
Butler, PA 16001

21
22 FOR THE DEFENDANT:
PAMELA G. COCHENOUR, ESQ.
Pietragallo, Bosick & Gordon
23 The Thirty-eighth Floor
One Oxford Centre
24 Pittsburgh, PA 15219

1 Q. Is there any other individual that you discussed
2 the loss of a loved one with, besides the ones
3 you've mentioned?

4 A. My fellow workers.

5 Q. Who?

6 A. Everybody in my department.

7 Q. Was there someone that you knew that had lost a
8 loved one that you had discussions with? I'm not
9 talking about generally.

10 A. No.

11 Q. When you met with Johan Maritz and Diane Kemick
12 at any meeting, did you always tell the truth?

13 A. Yes.

14 Q. How long have you been at Joy?

15 A. Thirty years.

16 Q. What's your education?

17 A. I have a two year degree from Triangle Tech in
18 Pittsburgh.

19 Q. What was the degree for?

20 A. Mechanical drawing.

21 Q. When did you graduate from Triangle Tech?

22 A. '69.

23 Q. And your first employer after that was?

24 A. Talon. T-A-L-O-N. Meadville.

25 Q. What as?

1 Q. Okay. And what did you do when you started at
2 Joy?

3 A. Draftsman.

4 Q. What do you do now?

5 A. Draftsman.

6 Q. Same job?

7 A. Yes.

8 Q. Tell us what your job entails as a draftsman?

9 A. I draw up hydraulic schematics. Also do
10 mechanical work drawing up parts on the machines
11 for Joy. Drawing up parts on the machine, like
12 mechanical parts.

13 Q. Anything else?

14 A. No.

15 Q. Does your wife work?

16 A. Yes.

17 Q. Where does she work?

18 A. Williams Decorating in Oil City.

19 Q. What kind of work does she do?

20 A. Sales.

21 Q. How long have you been married?

22 A. Thirty years.

23 Q. Have you ever engaged in any form of a romantic
24 relationship with any Joy employee?

25 A. No.

S I G N A T U R E

Samy E. Mode

11-7-06

NAME

DATE